

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In re:	:	Case No. 5:18-bk-0394-MJC
Bernice Williams,	:	Chapter 13
	:	
	:	
Debtor.	:	
	:	
U.S. Bank Trust National Association, not in its	:	
individual capacity but solely as owner trustee for	:	
RCF 2 Acquisition Trust c/o U.S. Bank Trust	:	
National Association,	:	
Movant,	:	
v.	:	
Bernice Williams,	:	
Jack N Zaharopoulos (Trustee),	:	
Respondents.	:	

ANSWER TO MOTION OF U.S. BANK TRUST NATIONAL ASSOCIATION, NOT IN ITS
INDIVIDUAL CAPACITY BUT SOLELY AS OWNER TRUSTEE FOR RCF 2
ACQUISITION TRUST C/O U.S. BANK TRUST NATIONAL ASSOCIATION FOR
RELIEF FROM AUTOMATIC STAY

AND NOW COME Debtor, Bernice Williams, by and through her attorneys, Newman,
Williams, P.C. and in Answer to the Motion of U.S. Bank Trust National Association, not in its
individual capacity but solely as owner trustee for RCF 2 Acquisition Trust c/o U.S. Bank Trust
National Association for Relief from Automatic Stay avers:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied to the extent the averments of paragraph 5 are anything other than a statement or
conclusion of law or request for relief that does not require a response.
6. Admitted.
7. Admitted.

8. Denied. After reasonable investigation Debtor does not have sufficient knowledge to admit this allegation, and therefore it is denied. By way of further answer, Debtors qualified for a forbearance that took effect on October 25, 2021, for a period of 8 months after which Debtor would apply for a loan modification to address the arrears accrued during the forbearance period.
9. Denied. After reasonable investigation Debtor does not have sufficient knowledge to admit this allegation, and therefore it is denied. By way of further answer, Debtors qualified for a forbearance that took effect on October 25, 2021, for a period of 8 months after which Debtor would apply for a loan modification to address the arrears accrued during the forbearance period.
10. Denied. After reasonable investigation Debtor does not have sufficient knowledge to admit this allegation, and therefore it is denied. By way of further answer, Debtors qualified for a forbearance that took effect on October 25, 2021, for a period of 8 months after which Debtor would apply for a loan modification to address the arrears accrued during the forbearance period.
11. Admitted.
12. Denied to the extent the averments of paragraph 12 are anything other than a statement or conclusion of law or request for relief that does not require a response.
13. Denied to the extent the averments of paragraph 13 are anything other than a statement or conclusion of law or request for relief that does not require a response.
14. Denied to the extent the averments of paragraph 14 are anything other than a statement or conclusion of law or request for relief that does not require a response.
15. Denied to the extent the averments of paragraph 15 are anything other than a statement or conclusion of law or request for relief that does not require a response.

WHEREFORE, Debtor, Bernice Williams, respectfully pray this Honorable Court for an Order that the Motion of U.S. Bank Trust National Association, not in its individual capacity but solely as owner trustee for RCF 2 Acquisition Trust c/o U.S. Bank Trust National Association for Relief from Automatic Stay be denied and for such other and further relief as the Honorable Court deems just and appropriate.

NEWMAN WILLIAMS, P.C.

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